

1 Keith Gillette (SBN 191082)  
2 E-mail: keith.gillette@bullivant.com  
3 Matthew A. Trejo (SBN 320464)  
4 E-mail: matthew.trejo@bullivant.com  
5 BULLIVANT HOUSER BAILEY PC  
6 101 Montgomery Street, Suite 2600  
7 San Francisco, CA 94104-4146  
8 Telephone: 415.352.2700  
9 Facsimile: 415.352.2701

10 Mark R. Figueiredo, Esq. (State Bar No. 178850)  
11 Austin T. Jackson, Esq. (State Bar No. 312698)  
12 STRUCTURE LAW GROUP, LLP  
13 1754 Technology Drive, Suite 135  
14 San Jose, California 95110  
15 Telephone: (408) 441-7500  
16 Facsimile: (408) 441-7501

17 Attorneys for Defendants and Counter-Plaintiff INDYZEN, INC.  
18 and Defendant PRAVEEN NARRA KUMAR

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

PARKRIDGE LIMITED and MABEL MAK,

CASE NO. 4:16-cv-07387-JSW

Plaintiffs,

Hon. Jeffrey S. White

vs.

**SUPPLEMENTAL DECLARATION OF  
MARK R. FIGUEIREDO IN SUPPORT OF  
MOTION FOR ATTORNEYS' FEES**

INDYZEN, INC., and PRAVEEN NARRA  
KUMAR,

Defendants.

INDYZEN, INC.,

**DATE:** May 7, 2020

**TIME:** 9:30 A.M.

**CRTM:** 5, 2<sup>nd</sup> Floor

1301 Clay Street  
Oakland, CA 94612

Counter-Plaintiff,

vs.

PARKRIDGE LIMITED, BOON GLOBAL,  
LIMITED, F8 VIETNAM COMPANY  
LIMITED, CALIFORNIA FITNESS & YOGA  
CENTERS COMPANY LIMITED, and  
RANDY DOBSON.

Counter-Defendants.

1 I, MARK R. FIGUEIREDO, declare and state as follows:

2       1. I am an attorney at law, duly licensed to practice before all courts in the State of  
3 California and an attorney with the law firm of Structure Law Group, LLP, attorneys of record  
4 for defendant/counter-claimants INDYZEN, INC. and PRAVEEN NARRA KUMAR  
5 (“Defendants”). I make this supplemental declaration in support of Defendants Motion for  
6 Attorneys’ Fees in response to this Court’s May 3, 2020 Order requesting additional information  
7 on two billers in the billing records.

8       1. Chris Ford – Paralegal (“CF”)

9           Mr. Ford obtained his paralegal certificate from the University of San Diego Paralegal  
10 Program in 2011. Mr. Ford has worked as a paralegal in general litigation for over 5 years and  
11 has been employed with Structure Law Group since 2016. Generally, in his role as a paralegal,  
12 Mr. Ford is responsible for preparing motions, preparing pleadings, preparing discovery requests  
13 and responses, preparing attorneys for settlement conferences, trials, mediations, and arbitrations,  
14 analyzing and processing documents, calculating court imposed and statutorily imposed  
15 deadlines, conducting legal research on procedural matters, assisting attorneys in the effectuating  
16 of service of discovery and lawsuits, reviewing documents propounded by opposing parties,  
17 drafting portions of petitions and declarations, and assisting attorneys with electronic discovery.

18       ///

19       ///

20       ///

21       ///

22       ///

23       ///

24       ///

25       ///

26       ///

27       ///

28       ///

2. Melinda Ward - Legal Assistant ("MW")

Ms. Ward obtained her experience through on-the-job training. Ms. Ward has been employed with Structure Law Group for over two years in her capacity as a legal assistant. Generally, in her role as a legal assistant, Ms. Ward is responsible for processing documents, calculating necessary court imposed deadlines and statutorily imposed deadlines, calendaring deadlines, preparing pleadings, assisting attorneys prepare for trial, arbitration, and mediation, preparing discovery requests, preparing objections to discovery requests, preparing discovery responses, filing documents with courts, as well as scheduling depositions and preparing attorneys for depositions.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed on May 4, 2020 at San Jose, California.

/s/ Mark R. Figueiredo